



April 14, 2025

Mrs. Michele Capps, Superintendent  
Murtaugh S.D.  
500 Boyd St W.  
Murtaugh, ID 83344

Dear Superintendent Capps,

On January 16, 2025, Idaho Department of Education Coordinators Child Nutrition Resources (CNR) conducted an Administrative Review (AR) of Murtaugh School District for the following United States Department of Agriculture (USDA) programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP) Operating Provision 2 breakfast option
- USDA Foods

The site reviewed was the Murtaugh Schools.

The State agency (SA) would like to commend Christine Worthington and the entire staff of Murtaugh School District for their hard work operating the school nutrition programs.

## OVERVIEW

The Richard B. Russell National School Lunch Act, amended by the addition of Section 201 to the Healthy Hunger Free Kids Act of 2010, requires a unified accountability system designed to ensure that participating school food authorities (SFA) comply with USDA requirements. The objectives of the AR are to:

- Determine whether the SFA meets program requirements.
- Provide technical assistance.
- Secure any needed corrective action.
- Assess fiscal action and, when applicable, recover improperly paid funds.

## REVIEW FREQUENCY AND SCOPE OF REVIEW

The Healthy Hunger-Free Kids Act mandates state agencies conduct an AR a minimum of one time during a three-year cycle, however Idaho has received a waiver to conduct reviews on an alternate schedule to evaluate Critical and General Areas of Review, including:

- Performance Standard 1: Meal Access and Reimbursement
- Performance Standard 2: Meal Pattern and Nutritional Quality

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- General Areas of Review: Resource Management, Food Safety, Local School Wellness Policy, Smart Snacks, Civil Rights, Buy American, Professional Standards, and other areas of general program compliance.

These were the SA determined findings and the SFA response to the findings:

## **FINDINGS AND CORRECTIVE ACTION PLAN (CAP)**

### **Finding 1 – Revenue Form Nonprogram Foods**

Adult Breakfasts are not priced sufficiently high enough to cover the overall cost of the meal in SY 24-25. The SFA is only charging \$2.75 per Adult Breakfast instead of the State required minimum of \$2.85 per breakfast.

**CAP:** Provide a process, procedure, or policy to ensure adult meals will be priced at least at the minimum required by the State Agency each year. The Plan must include the SFA title/position of the party responsible who will ensure compliance going forward and the effective date of the new Plan.

**Due Date:** February 11, 2025; Completed February 12, 2025

**Response:** The Food Service Director (FSD) uploaded a Corrective Action Procedure including the process to ensure all adult meals will be priced at the minimum requirement or higher.

### **Finding 2 – Revenue from Nonprogram Foods**

The Nonprogram Foods Revenue Tool indicated the SFA was non-compliant with the required revenue ratio during the 5-day reference period.

**CAP:**

1. Raise nonprogram food prices and provide documentation to support the increases prior to review month January 2025.
2. Provide a step-by-step process to ensure the required Nonprogram Foods Revenue Tool is completed on an annual basis. If non-compliance is shown, the SFA will increase nonprogram foods or replenish the food service account through non-Federal funds. Process must include the title/position of the person(s) responsible for ensuring compliance going forward.

**Due Date:** February 11, 2025; Completed February 12, 2025

**Response:**

1. The FSD raised the Adult Breakfast price to \$2.85 as required.
2. The FSD uploaded a Non-Program Foods Corrective Action Procedure which states the Nonprogram Foods Revenue Tool must be completed each year. The FSD is the individual responsible for ensuring this process is completed annually.

### **Finding 3 – Meal Counting and Claiming - Lunch**

For the month of review, the School Food Authority (SFA) had meal count errors in their claim. The counts by category (free and paid) were not correctly submitted for the lunch reimbursement.

**CAP:**

1. Determine what caused the error in the meal counts and include a detailed explanation of the new/revised process that will be implemented to ensure accurate meal counting and claiming moving forward. Utilize the NSLP corrective action procedure form.
2. Advise when the finding was brought into compliance and state the name of the person responsible at the SFA for ensuring compliance.

**Due Date:** February 11, 2025; Completed February 11, 2025

**Response:**

1. The FSD wrote a detailed response stating there was no error in the claim. The FSD had made updates in their computer system and after the updates were made, the FSD mistakenly provided CNR with an edit check that did not have the recent updates included. The FSD uploaded an NSLP Corrective of Action Procedure form with detailed instructions on how to submit a counting and claiming report.
2. The FSD is the individual responsible for submitting their claim and on February 7, 2025, and the FSD uploaded the correct edit check that matches the claim submitted.

**Finding 4 – Meal Components and Quantities – Lunch**

For the week of menu review, the 9-12 lunch menu did not meet the minimum daily requirements for grain. The federal regulations require menus to be planned that meet the minimum daily 2-ounce equivalent grain requirement for grades 9-12. This requirement was not met on Tuesday, November 5, 2024, with only 1 oz. eq. offered.

**CAP:**

1. Provide a written statement to describe the specific changes made to the menu, for the week of review, to correct all menu review findings and bring the menu into compliance.
2. Submit supporting documentation to demonstrate that the menu findings for the week of menu review are now corrected. This documentation may include menus, production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes. Reference the menu review results report for specific details and suggestions to bring the menu into compliance.
3. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.

**Due Date:** February 11, 2025; Completed February 3, 2025

**Response:**

1. The FSD uploaded supporting documentation indicating the serving size of the breadstick offered for grades 9-12 was increased to 2oz. eq. grain. The menu is now in compliance with regulations.
2. A Nutritional Analysis was uploaded into MyIdahoCNP that documents the grain requirement will be met moving forward.
3. The FSD is the individual who is responsible for ensuring menu compliance.

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## COMMENDATIONS

- The Food Service Director is starting her first full year in her new position. She is enthusiastic and expresses interest in shadowing and mentoring seasoned food service directors.
- The cafeteria was decorated nicely with nutritional posters and the serving line area was arranged to serve students efficiently.
- The Food Service Director and her team work well together in a supportive manner to adhere to program regulations and maintain program participation.

## TECHNICAL ASSISTANCE (TA)

### Meal Components and Quantities – Breakfast and Lunch

#### Breakfast:

- Production records must indicate meal pattern crediting for all menu items each day. The submitted production records do not consistently include meal pattern crediting for all menu items each day.
- Secure a Child Nutrition (CN) Label or Product Formulation Statement (PFS) for the breakfast pizza and French toast sticks. The spec sheets submitted included a CN number and meal pattern crediting statement but were not an official CN Label or PFS. The CN numbers were verified as active on the USDA CN Label Verification Report.
- A Child Nutrition Label or Product Formulation Statement was not submitted for the following processed menu items. This documentation was secured, to confirm meal pattern crediting. A sponsor should maintain this documentation on file to document meal pattern requirements as met.
  - Strawberry cream cheese mini bagels
  - Cinnamon cream cheese mini bagels
- The sponsor must separate the reimbursable meals served from the adult meals on the production record(s). This should be completed after the meal service and the data should come from the meal count system.

#### Lunch:

- Production records should be completed for each grade group if different food items and/or quantities are being served. For example, Kindergarten should have their own production record as their menu is different than the other grades on the current production record. Also, grades 1-5 should be separate from grades 7-12, as they have different requirements as well.
- Manufacturer specification sheets with product codes were submitted for the tortilla. A nutrition facts label was secured to confirm meal pattern crediting.

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### Revenue From Nonprogram Foods

- Per State Agency guidance, all second entrees should be priced, at a minimum, at the same price as adult meals. In addition, non-program food costs should be 40% or less of the amount charged for a la carte items. This will help ensure compliance with the nonprogram foods revenue ratio.

### Professional Standards

- During the administrative review, hiring requirements with regards to food safety training were discussed with the SFA. To comply, the SFA must ensure that any new director meets the new Professional Standards, including completing the required number of food safety training hours. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs. This can be found in Download Forms in MyIdahoCNP.

### FISCAL ACTION

Due to a meal counting and claiming error, fiscal action for NSLP results in \$28.07. However, since this falls under the \$600.00 threshold, the fiscal action will be disregarded and no financial adjustment will occur.

### YOUR REVIEW IS NOW CLOSED.

If you wish to discuss any of these findings, please contact me at (208) 332-6820.

Thank you for your continued support of the Child Nutrition Programs.

Sincerely,

*Jessica Medrano*

Jessica Medrano  
NSLP Coordinator

cc: Lynda Westphal, MHS, SNS, Director, Idaho Child Nutrition Programs  
Christine Worthington, Child Nutrition Director, Murtaugh School District

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